



351659

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan



1/26/99

meeting

conference call

w/ Keith Watson

~~Debbie Orr~~
Debra

attending

C. Harvey
Cedric Gibson
Bill Spedding
Pete Goetz
Scott Lockhart
Elena Tambrell
Ralph Dosthopt



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issues To Be Discussed

- Issue 1: Storm Sewer Infiltration
- Issue 2: Seepage from North/West Bank of Williams Ditch
- Issue 3: Status of Stockpiles



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 1: Storm Sewer Infiltration

While installing the ditch bypass system, free product was observed flowing into the upstream limits of the sediment management area via the 36" storm sewer that services Arco Drive south of Williams Ditch.

The storm sewer systems servicing Arco Drive and Frenchmens Road were cleaned and videotaped.



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 1: Storm Sewer Infiltration

Based on the results of the videotaping activities, sections of both storm sewer systems were identified as potential avenues of infiltration.

As a result, three options were developed to address these sections.



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 1: Storm Sewer Infiltration

Options Considered

- Remove existing system and replace with RCP system
- Remove existing system and replace with HDPE system
- Use an in-situ method to prevent infiltration into these sections.



HULL & ASSOCIATES, INC.

Ralph → problem - where does creosote go

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

*Scott →
"best long-term
solution"*

*bevel shaped clay aqueduct
draws away from
ditch and sewer*

Issue 1: Storm Sewer Infiltration

Recommended Option : In-situ method

backfill with clay at pit

and in handpipe to tie system together

- Slipline the Arco Drive and half of the Frenchmens Road storm sewer systems.
- Replace the half of the Frenchmens Road storm sewer system that has already been removed with an HDPE system.



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

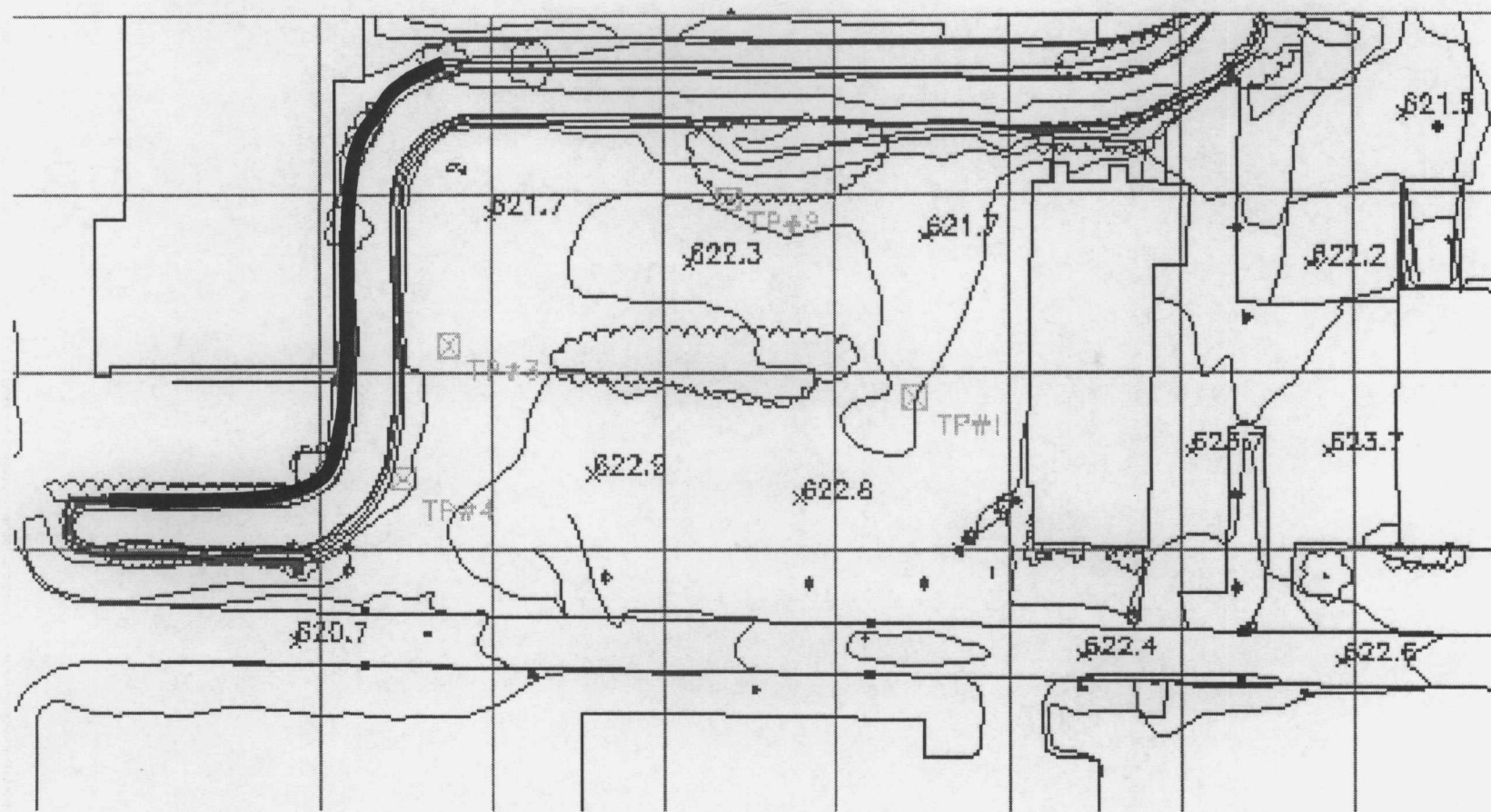
Issue 2: Seepage from North/West Bank

During the sediment removal process, seeps/pockets of product were observed on the north and west banks of Williams Ditch.



HULL & ASSOCIATES, INC.

GENERAL SEEP LOCATIONS



GENERAL LOCATION OF SEEPS



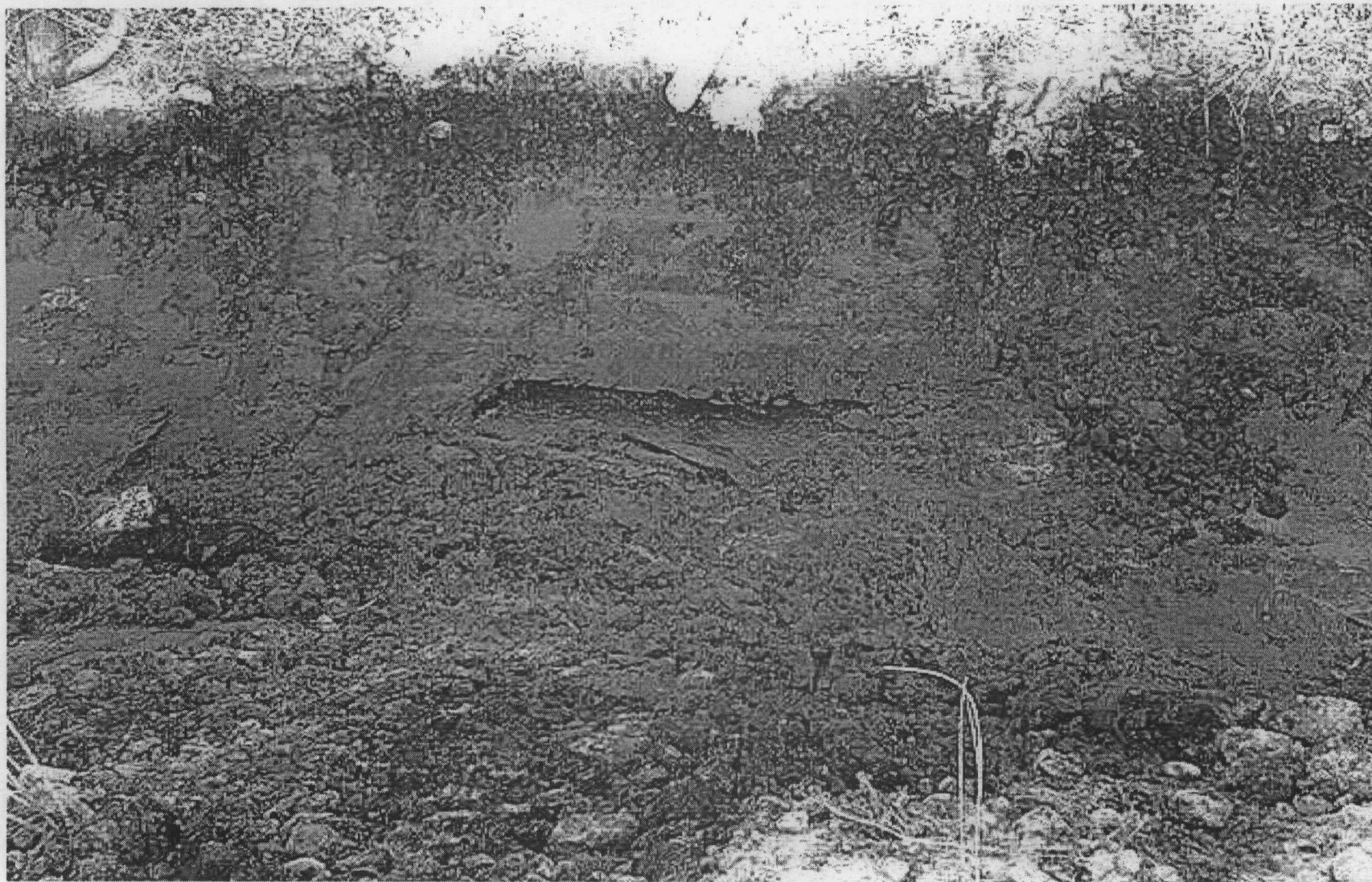
HULL & ASSOCIATES, INC.

SEEPS ALONG SOUTH SIDE OF LBA PARKING LOT



HULL & ASSOCIATES, INC.

SEEPS ALONG EAST SIDE OF LBA



HULL & ASSOCIATES, INC.

SEEPS AT FIRST 90 DEGREE BEND EAST OF ARCO



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 2: Seepage from North/West Bank

Initially, approximately six inches of soil were scraped off the banks in the area where seeps were observed. Although this removed the original seeps, some new seeps were exposed.



HULL & ASSOCIATES, INC.

SEEP AREA AFTER SCRAPING



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

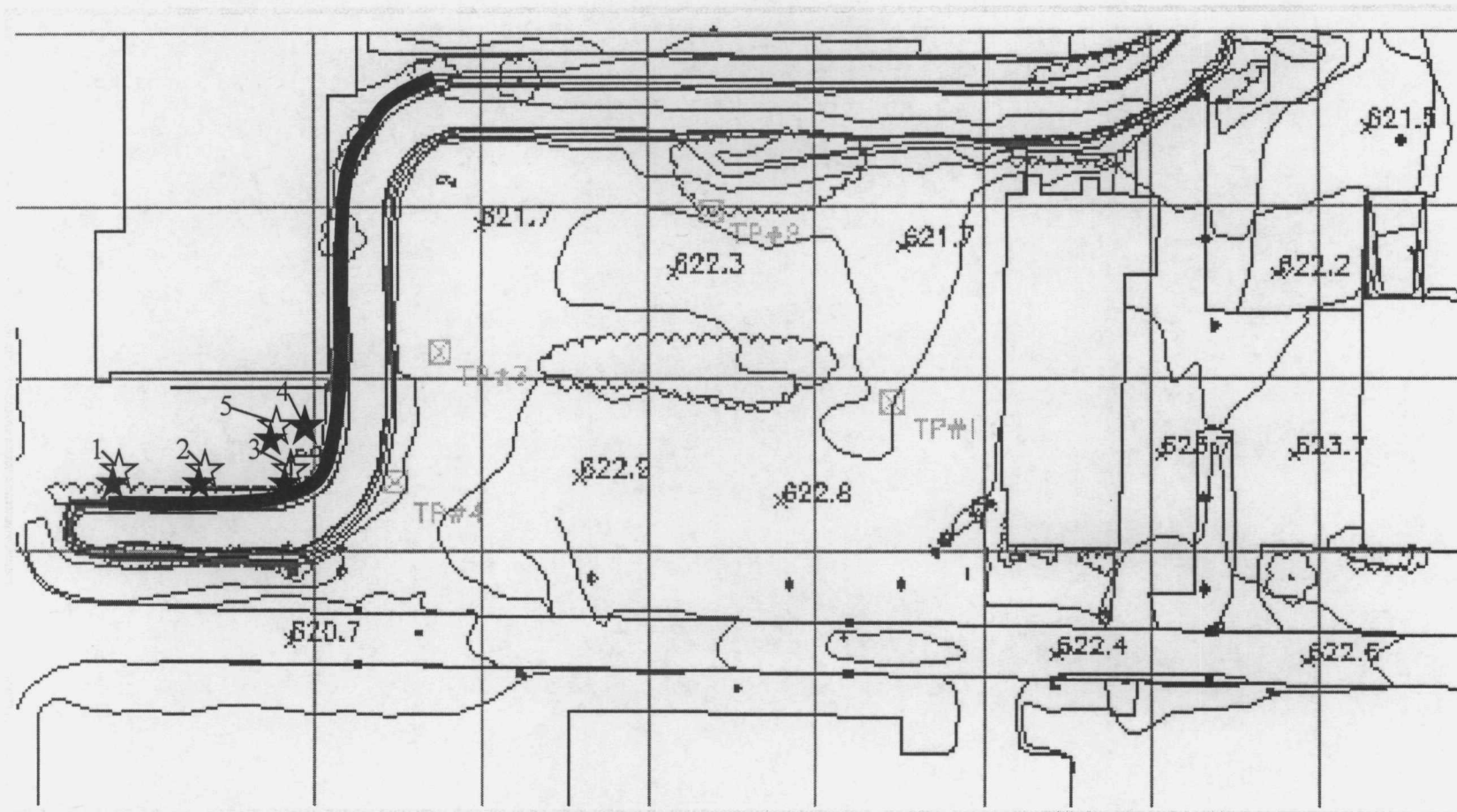
Issue 2: Seepage from North/West Bank

In order to investigate the location of the seep materials, a truck mounted Geoprobe[®] was used to collect soil borings within the LBA parking lot. Due to insufficient access, soil borings were not collected between the eastern side of the LBA building and the ditch bank.



HULL & ASSOCIATES, INC.

APPROXIMATE SOIL BORING LOCATIONS



GENERAL LOCATION OF SEEPS

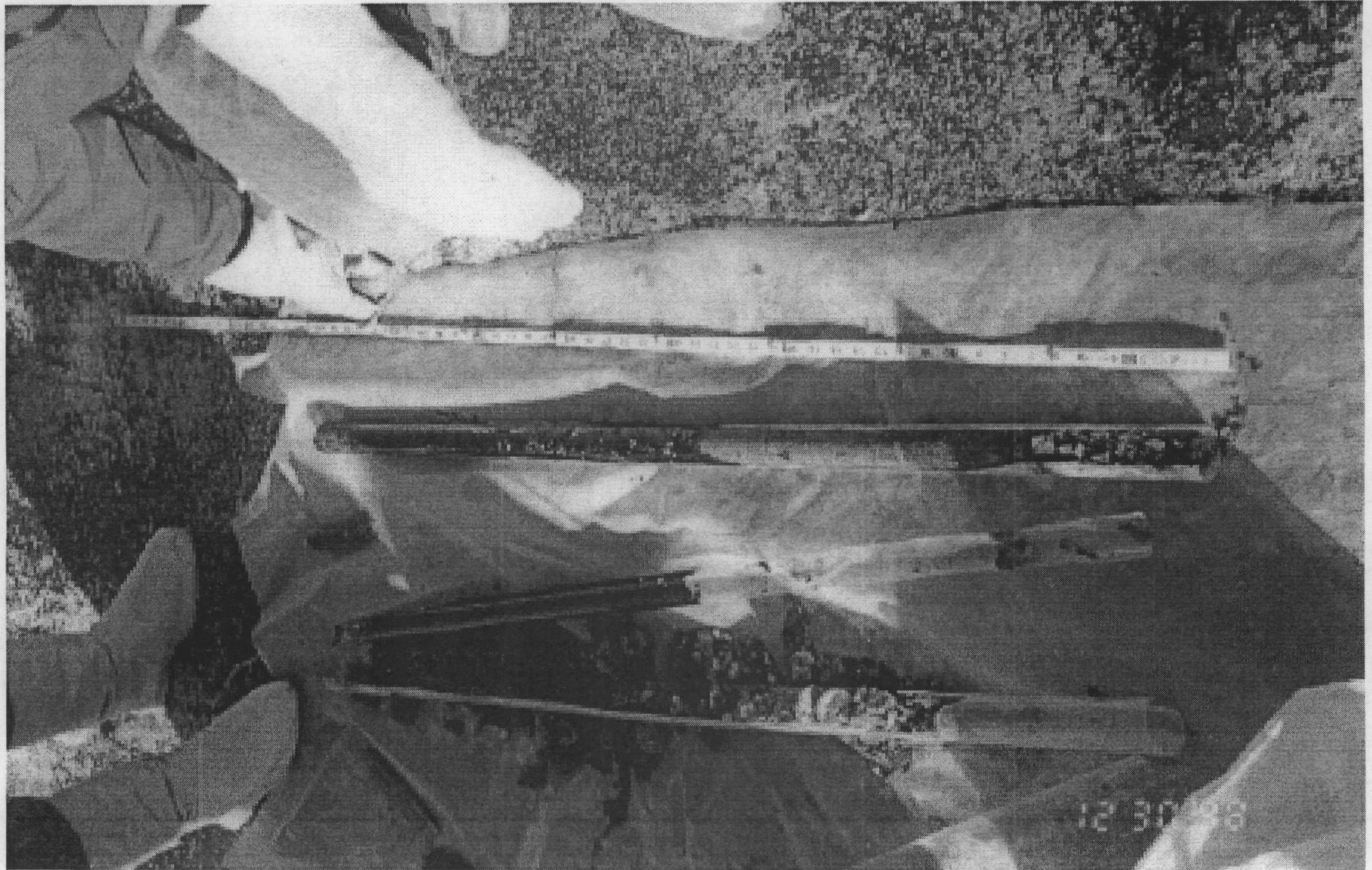


APPROXIMATE SOIL BORING LOCATION



HULL & ASSOCIATES, INC.

SOIL BORING No. 4



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 2: Seepage from North/West Bank

Based on these soil borings, it was determined that the seeps/pockets of product extended into the LBA parking lot. As a result, options for addressing the seeps needed to be evaluated.



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 2: Seepage from North/West Bank

Options Considered

- Excavate and Remove Source Material
- Sheet Piling
- Line Ditch (FML, Clay, Concrete)
- Enclose Williams Ditch



HULL & ASSOCIATES, INC.

how deep were test pits?
4' - not deep enough

manifold parking lot and roof drain

HAI → to the clay

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

test pits by
1st bend of
Ditch

Issue 2: Seepage from North/West Bank

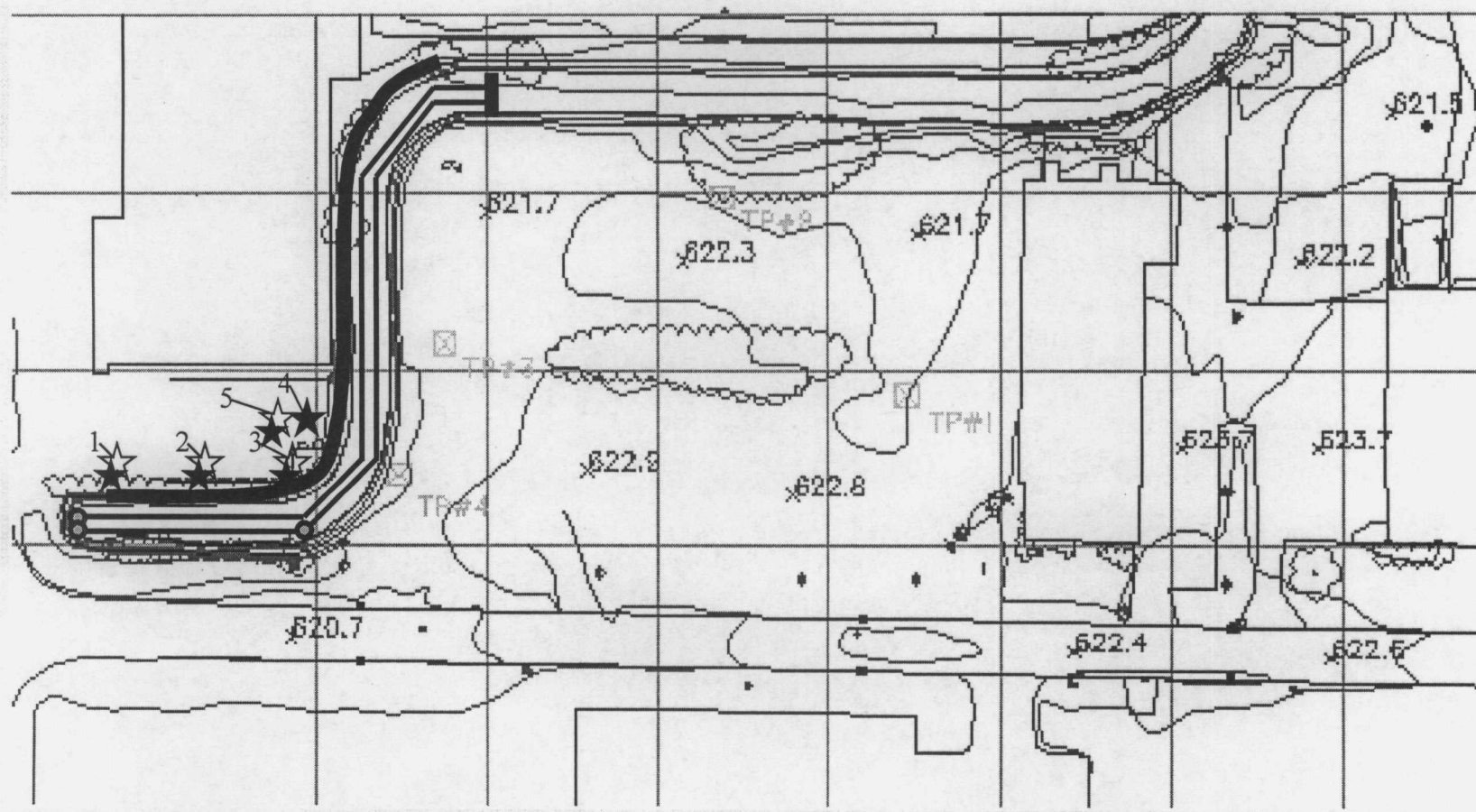
Recommended Option : Enclose Williams Ditch

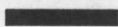


Enclose Williams Ditch with two 48" HDPE pipes from Arco Drive to the second 90 degree bend in Williams Ditch.



HULL & ASSOCIATES, INC.

CONCEPTUAL DRAWING OF PIPE LAYOUT



-  GENERAL LOCATION OF SEEPS
-  APPROXIMATE SOIL BORING LOCATION
-  PIPING SYSTEM



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 3: Status of Stockpiles

- Are the clean, questionable, asphalt, and subgrade piles a listed hazardous waste?
- Is there a ninety day storage issue?
- What determines if a contaminated media still contains a listed waste?



HULL & ASSOCIATES, INC.

request for
workplan
extension

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

2500 tons
of material

we write a letter
for proposal of ~~waste~~ soil management
RCA approval

Issue 3: Status of Stockpiles

sign off on
letter

If there is a ninety day storage issue, request the thirty day storage extension.

not an issue
on Superfund
site

Establish site specific, health-based screening levels to
determine if the media still contains a listed waste

Obtain approval of the screening levels from U.S. EPA.

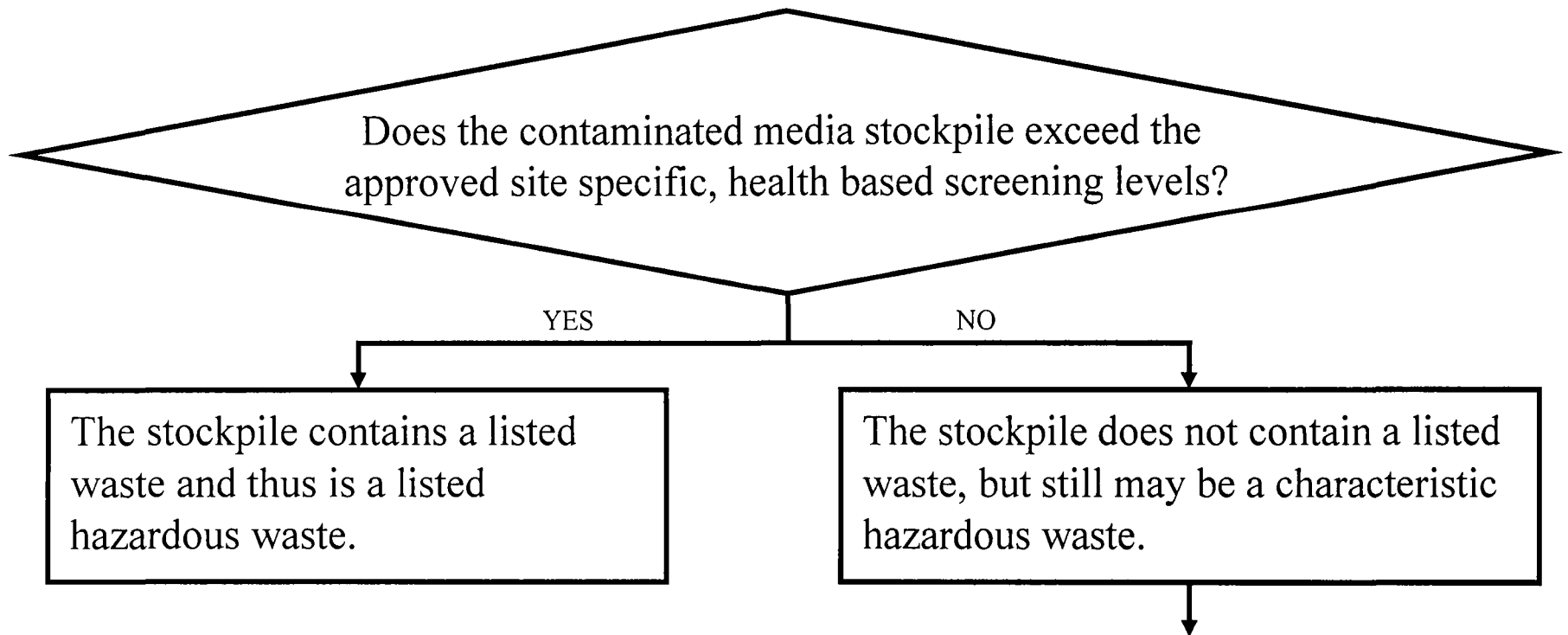
still remove
waste according to
order or
US EPA approval
for treatment



HULL & ASSOCIATES, INC.

Toledo Tie Treatment Site Kerr-McGee Chemical, LLC Time Critical Removal Plan

Issue 3: Status of Stockpiles



HULL & ASSOCIATES, INC.

*letter
about
silver
Herald
step
in*

NO

The stockpile is not a hazardous waste,
but is it still a solid waste?



HULL & ASSOCIATES, INC.